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KEENAN G. CASADY, Clerk  
U.S. BANKRUPTCY COURT-SANTA ROSA

6 UNITED STATES BANKRUPTCY COURT  
7  
8 NORTHERN DISTRICT OF CALIFORNIA

8	In re	)	Case No. 95-10911 aj
9		)	
10	GERALD ARMSTRONG,	)	Chapter 7
11	Debtor	)	Adv. No. 95-1164
12		)	GERALD ARMSTRONG'S
13	CHURCH OF SCIENTOLOGY	)	ANSWER
14	INTERNATIONAL, a California non-	)	
15	profit religious corporation,	)	
16	Plaintiff,	)	
17	v.	)	
18	GERALD ARMSTRONG,	)	
19	Defendant.	)	

20 INTRODUCTION

21 Plaintiff Scientology organization has been judicially  
22 declared paranoid and schizophrenic. Scientology's paranoia and  
23 schizophrenia are a reflection of its founder L. Ron Hubbard.  
24 Hubbard was judicially declared to be a pathological liar,  
25 greedy, lustful of power, vindictive, and aggressive against  
26 persons he perceived as disloyal or hostile. Out of his paranoia  
27 and schizophrenia, Hubbard concocted and adopted a philosophy and  
28 practice of opportunistic hatred as his way of dealing with  
persons so perceived. Out of his paranoia and schizophrenia



1 Hubbard targeted and labelled persons so perceived "suppressive  
2 persons," (or "SPs") and "enemies." At a certain point Hubbard  
3 called his philosophy and practice of opportunistic hatred, "fair  
4 game," and he formed an organization, which he called a "church,"  
5 to carry out his "fair game" intentions, plans, programs,  
6 operations and orders. He used the resources and personnel of  
7 the Scientology organization to carry out antisocial and criminal  
8 acts against individuals and groups designated as "enemies."  
9 Hubbard's "fair game" policy, which has been several times  
10 judicially condemned, states: "ENEMY - SP Order. Fair game. May  
11 be deprived of property or injured by any means by any  
12 Scientologist without the discipline of the Scientologist. May  
13 be tricked, sued or lied to or destroyed." Out of his paranoia  
14 and schizophrenia Hubbard further instructed his "church" to use  
15 society's legal systems to harass and ruin perceived "SPs" or  
16 "enemies." It has been judicially declared that his Scientology  
17 organization has a history of violating and abusing its own  
18 members' civil rights, and harassing and abusing those persons  
19 not in the organization whom it perceives as enemies. It has  
20 been judicially declared that the Scientology organization is  
21 fully capable of intimidation or other physical or psychological  
22 abuse if it suits their ends. Hubbard and Scientology, while  
23 knowing that defendant Armstrong was neither an "SP" nor an  
24 "enemy," as said terms are used and defined in Scientology's  
25 policies, orders and other writings, so labelled him, and  
26 subjected him to "fair game" until Hubbard died in 1986.  
27 Scientology's new leader David Miscavige has continued its "fair  
28 game" doctrine until the present, and his Scientology  
organization continues to the present to label and target



1 Armstrong as an "SP," an "enemy," and "fair game." The instant  
2 complaint by Scientology is the product of Miscavige's and  
3 Scientology's paranoia and schizophrenia manifested in their  
4 "fair game" doctrine and attacks. Miscavige and Scientology have  
5 known throughout the time period covered by the matters herein of  
6 the judicial condemnation of "fair game." Miscavige and  
7 Scientology are harassing Armstrong with judicial enforcement of  
8 an illegal and evil contract, his signature on which they  
9 obtained by extortion, fraud and the abuse of his common decency  
10 and trust. From the time of signing of said contract to the  
11 present, Miscavige and Scientology have subjected Armstrong to a  
12 campaign of covert and overt character assassination (which  
13 Scientology calls "black propaganda"), stalking, threat, lies and  
14 litigation. Scientology has a reputation in its legal affairs  
15 for dirty tricks, threat, dishonesty, deception, attrition and  
16 overwhelm which is widely known and feared by this country's  
17 attorneys and by the media. Scientology also has a widely known  
18 reputation for using bullying and dishonest private investigators  
19 to harass perceived opponents pursuant to "fair game" and for  
20 shielding their aggressive and corrupt activities behind the work  
21 product privilege of corrupt attorneys. All of Armstrong's  
22 actions which Scientology claims are breaches of its "contract"  
23 were in logical, legal response to Miscavige's and Scientology's  
24 dangerous and damaging "fair game" activities. Armstrong's  
25 actions have all been justified and privileged, and Scientology  
26 has not been damaged in any way by his actions. The instant  
27 complaint is one part of Miscavige's and Scientology's program to  
28 misuse the legal system to harass and ruin Armstrong.

Miscavige's and Scientology's misuse of the legal system is one



1 front in their war on Armstrong, the purpose of which is his  
2 demise. This is not a purpose for which the legal system and the  
3 nation's courts may be used.

4 For the fleeting illusion of power and wealth Hubbard sold  
5 his soul to the world's dark force of evil. Out of his paranoia  
6 and schizophrenia Hubbard considered himself anti-Christ and  
7 devised an anti-Christian philosophy and organization to achieve  
8 his anti-Christian goals of world power and wealth. Armstrong is  
9 a Christian. Armstrong believes he has been called by God to  
10 bring His Light to Scientology's benighted and enslaved souls.  
11 Armstrong believes his experiences are God's and that he cannot  
12 be silenced by man's courts concerning his experiences or about  
13 Scientology's dark, secret and anti-Christian nature. Armstrong  
14 believes that Scientology is dangerous to himself, others, to  
15 wisdom, and to goodness itself, and that Scientology's  
16 dangerousness is reduced by bringing its dark, secret and anti-  
17 Christian nature to light, and by not succumbing to the threat  
18 and of its evil "fair game" doctrine.

#### 19 HISTORY

20 Armstrong was in Scientology from 1969 through 1981.  
21 Throughout those years he believed Hubbard's and Scientology's  
22 public representations about their history, credentials,  
23 research, and benevolent intentions. Armstrong accepted  
24 Hubbard's and Scientology's guarantees of higher intelligence,  
25 greater freedom, increased abilities and elevated ethics that  
26 they made for their psychological processing, or "auditing."  
27 Armstrong gave Hubbard and Scientology his allegiance, support  
28 and life, which Hubbard and Scientology, out of their paranoia  
and schizophrenia, systematically and callously abused.



1       From 1971 through 1981 Armstrong was in the Sea  
2       Organization, one of the two administration and power arms  
3       through which Hubbard controlled Scientology around the world.  
4       The other power arm of Scientology that Hubbard used to maintain  
5       control was the Guardian's Office, headed by his wife Mary Sue  
6       Hubbard. Armstrong worked with Hubbard for four years on his  
7       ship, the "Apollo," and held the positions of public relations  
8       officer, legal officer and intelligence officer. Armstrong later  
9       was in charge of Hubbard's telex and mail traffic at a base in  
10      Florida, and then Hubbard's household staff at a base in southern  
11      California. Throughout his Sea Org experience Armstrong gained a  
12      knowledge of organization structure, function, control, finances,  
13      personnel, policies and operations. During 1980 and 1981  
14      Armstrong assembled an archive of Hubbard's personal records,  
15      correspondence and writings of all kinds, and did the research  
16      for a Hubbard biography. Armstrong provided Hubbard's personal  
17      archive materials to non-Scientologist writer Omar V. Garrison  
18      who had been contracted to write the biography.

19           Through his study of Hubbard's archive, and the  
20      integration of his knowledge and experiences gained throughout  
21      his years in Scientology, Armstrong discovered and documented the  
22      fact that Hubbard and Scientology had systematically and  
23      callously lied in their public representations about their  
24      history, credentials, research, benevolent intentions, and  
25      guarantees for auditing. Armstrong discovered and documented the  
26      facts that Hubbard claimed to be a civil engineer and nuclear  
27      physicist who excelled in his university education; yet he had  
28      actually failed his few courses in physics and dropped out of  
    university without completing his second year. Armstrong



1 discovered and documented the facts that Hubbard claimed that it  
2 was a matter of medical record that he had twice been pronounced  
3 dead; yet no such incidents had happened beyond Hubbard's  
4 admitted nitrous oxide hallucination of his death during a tooth  
5 extraction. Armstrong discovered and documented the facts that  
6 Hubbard claimed that his naval service was glorious, that he had  
7 been crippled and blinded in action, and that he had cured  
8 himself at the war's end of his battle wounds with his new mental  
9 technology "Dianetics;" yet Hubbard's naval career was something  
10 different from glorious, he was not crippled nor blinded in  
11 action, he feigned his medical conditions to get out of the  
12 service and to obtain a disability pension, and, decades after he  
13 claimed to have cured himself and, to everyone's amazement, have  
14 been given a perfect score on a mental and physical tests, he  
15 continued to draw a disability pension for his feigned injuries.

16  
17 Armstrong discovered that Hubbard lied about his family,  
18 including falsely denying his bigamous second marriage and the  
19 paternity of his second daughter. Armstrong discovered that  
20 Hubbard, while claiming to have been sent by the US Navy into a  
21 black magic ring to break it up, had actually been a participant  
22 in the black magic cult and its rituals, including a blood  
23 ritual. Armstrong discovered that Hubbard, while claiming to  
24 have based and developed Scientology on his pure scientific  
25 research, had actually based and developed it on his decision  
26 for, and use of, neo-satanic power, for which he had joined the  
27 black magic cult, then headed by the "great beast," Aleister  
28 Crowley.

Armstrong discovered that Hubbard's claims of altruistic



1 and benevolent motives, that, e.g., he, his philosophy and  
2 organization were working to free mankind, were false. When  
3 starting Dianetics and Scientology Hubbard programmed himself  
4 with the command that all men were his slaves, and through the  
5 ensuing years treated them as such. Armstrong discovered that  
6 Hubbard was greedy, lustful of power, vindictive, and aggressive  
7 against persons he perceived as disloyal or hostile. Armstrong  
8 discovered that contrary to Hubbard's and Scientology's  
9 assertions that Hubbard received no money from Scientology and  
10 was paid less than an average staff member, Hubbard had control  
11 of all Scientology monies and bank accounts and had unilaterally  
12 transferred many millions of dollars to his own accounts.

13 Armstrong discovered that Hubbard's and Scientology's system  
14 of "ethics" and "justice" procedures, were neither ethical nor  
15 just, but was really a kangaroo court system which served  
16 Hubbard's purposes of maintaining ironfisted, dictatorial  
17 control, obliterating ing any criticism, and keeping staff  
18 members and Scientologists in fear and suppressed. Armstrong  
19 discovered that Hubbard's promise of an increase in intelligence  
20 quotient of one point per hour of auditing was false (Armstrong  
21 had by then had over one thousand hours) and that in fact the  
22 further one went on in Scientology the less intelligent one  
23 became. Armstrong discovered that contrary to Hubbard's and  
24 Scientology's promise of the sanctity and confidentiality of  
25 statements made by people being audited, these statements were  
26 not kept confidential but could be and were used by Hubbard and  
27 Scientology to control and harm the people if it served Hubbard's  
28 and Scientology's antisocial purpose.

Armstrong discovered that Hubbard's and Scientology's



1 promise of higher ethical standards as a result of undergoing  
2 auditing and adherence to Scientology was false and that auditing  
3 and Scientology produced in the adherents who had risen to the  
4 apex of its organizational pyramid dishonesty, stupidity,  
5 antisocialness and aggressiveness. Armstrong discovered that  
6 contrary to Hubbard's and Scientology's assertion that auditing  
7 and other Scientology practices kept families together and  
8 improved marital relations, in fact they turned parents and their  
9 children against each other and broke families apart. Armstrong  
10 discovered that contrary to Hubbard's and Scientology's assertion  
11 that auditing made people sane and able, cured diseases such as  
12 cancer and guaranteed superior physical health, there was in fact  
13 an inordinate number of suicides and psychotic episodes among  
14 people who had been audited and all auditees were generally  
15 delusional. Scientologists were as sick and died of cancer and  
16 other diseases as readily as anyone else, and were generally  
17 unhealthy. Armstrong discovered that Hubbard himself was  
18 addicted to drugs, in poor physical health, and often  
19 pathologically sullen or enraged, and Armstrong knew that Hubbard  
20 and Scientology hid these conditions from the world. Armstrong  
21 discovered that rather than admitting the damage and failures of  
22 auditing Hubbard and Scientology attacked any critics and  
23 attacked the persons who had been damaged. Armstrong discovered  
24 that Hubbard had relabeled his "psychotherapy" a "religion" to  
25 avoid having to make good on his "scientific guarantees."  
26 Hubbard called this idea the "religion angle."

27 Armstrong discovered that Hubbard and Scientology  
28 consistently lied in judicial proceedings and required that their  
adherents lie for them, including lying about Hubbard's control



1 of Scientology, his control of Scientology funds, his control of  
2 the Guardian's Office intelligence operations(11 GO staff,  
3 including Mary Sue Hubbard, were convicted of Federal crimes and  
4 sentenced to prison as a result of an FBI raid on Scientology's  
5 intelligence bureaus in 1977) organization structure, the  
6 organization's ability to communicate with Hubbard, their  
7 intentions, and neo-satanic origins, attitude and practices.  
8 Armstrong discovered that Hubbard and Scientology, rather than  
9 face the truth about their origins, attitude and practices,  
10 sought to subvert the justice system through dirty tricks, lies,  
11 threat, deception, attrition and overwhelm.

12 Armstrong discovered that he had been brainwashed by Hubbard  
13 and Scientology, and that Scientologists everywhere are subjected  
14 to the identical brainwashing. Armstrong discovered that he had  
15 been cruelly abused by Hubbard and Scientology, and that  
16 Scientologists everywhere are similarly abused. Armstrong  
17 discovered that Hubbard and Scientology uses a system of  
18 punishment, fear, control of language, control of information,  
19 control of environment, time and human contact, electronic-  
20 assisted interrogations, imprisonment, and control of thought,  
21 which is able to achieve complete dominion over the minds and  
22 lives of Scientologists to their detriment. It brings them to  
23 support, defend and give their lives to the very spiritless  
24 system which hates them and means them harm. Armstrong  
25 discovered that the truth concerning Hubbard's and Scientology's  
26 origins, history, actual intentions, practices, operations and  
27 efficacy was kept from Scientologists, and that anyone who sought  
28 to bring that truth to Scientologists was ruthlessly attacked.

When Armstrong sought while inside to have Scientology



1 correct its lies and abuses he was threatened and attacked. He  
2 left Scientology and was declared an "SP" and became "fair game."  
3 Hubbard's and Scientology's black propaganda "SP Declare" on  
4 Armstrong falsely accused him of crimes and lying about Hubbard.  
5 Hubbard personally ordered that Armstrong be destroyed.  
6 Armstrong contacted Boston attorney Michael J. Flynn. Armstrong  
7 obtained documents from Garrison which he thought would be needed  
8 to defend himself, and he sent these to Flynn.

9 From 1982 through 1984 Scientology's "fair game" acts toward  
10 Armstrong included spying on him and his wife; hiring private  
11 investigators to spy on and harass them; having a private  
12 investigator assault Armstrong, and another hit him with a car  
13 and attempt to involve him in a freeway "accident;" suing him;  
14 attempting to have him falsely charged with theft; subjecting him  
15 to a black propaganda and stalking campaign. Armstrong filed a  
16 cross-complaint against Scientology for fraud and intentional  
17 infliction of emotional distress.

18 In 1984, following a thirty day trial in Los Angeles  
19 Superior Court, a decision was rendered by Judge Paul G.  
20 Breckenridge, Jr. in Armstrong's favor in Scientology's case from  
21 which his cross-complaint had been severed. This decision, which  
22 was affirmed on appeal in 1991, is attached hereto as Exhibit A.

23 After the 1984 trial through 1986 Scientology's "fair game"  
24 acts toward Armstrong included a Scientology private investigator  
25 threatening to murder him; filing false contempt of court charges  
26 against him; attempting to have the FBI charge him based on false  
27 information; attempting to have the Los Angeles District Attorney  
28 bring charges against him based on false information; culling and  
disseminating his statements made in auditing; paying agents to



1 write false affidavits against him; using his friends to set him  
2 up in a covert intelligence operation; illegally videotaping him;  
3 attempting to entrap him in commission of a crime; subjecting him  
4 to further black propaganda, including international publications  
5 falsely accusing Armstrong of crimes against humanity.

6        Scientology also subjected attorney Flynn to years of "fair  
7 game," which included suing him or his office more than a dozen  
8 times; infiltrating his office; threatening his career and  
9 family; paying known criminals for declarations falsely accusing  
10 him of crimes; framing him with a crime; attempting his  
11 assassination; and subjecting him to an international stalking  
12 and black propaganda campaign.

13        In late 1986, out of desperation to get away from the threat  
14 of Scientology's "fair game" operations, Flynn agreed with  
15 Scientology to a "global settlement" of all of the cases in which  
16 he was then involved against the organization, including  
17 Armstrong's cross-complaint, then set for trial at the beginning  
18 of 1987. Flynn was to be paid a lump sum which he was to divide  
19 between his clients and himself. Armstrong agreed to a monetary  
20 figure with Flynn to settle his cross-complaint. Scientology and  
21 Flynn worked out and agreed to the language of the settlement  
22 documents before Armstrong, who was then working for Flynn, was  
23 shown any papers. Armstrong was flown from Boston to Los  
24 Angeles, and other Flynn clients were flown to Los Angeles for  
25 the settlement, before Armstrong saw the documents he was  
26 expected to sign, and was told by Flynn that Scientology would  
27 not change the documents. Armstrong was broken hearted when he  
28 read the settlement documents. He had not been involved in any  
negotiations or settlement discussions, and he felt ganged up on.



1 He protested to Flynn that it was impossible to live by the  
2 settlement contract; that he would not agree to the \$50,000 per  
3 statement liquidated damages clause; that the contract was just  
4 more "fair game." Flynn stated to Armstrong in response to  
5 Armstrong's protest that the settlement contract "isn't worth the  
6 paper it's printed on;" that Armstrong couldn't "contract away  
7 [his] constitutional rights;" that "it's unenforceable." Flynn  
8 pointed out to Armstrong the clauses concerning Armstrong's  
9 dismissal of his cross-complaint and his release of Scientology  
10 up to that date; and Flynn told Armstrong, "That's what they're  
11 paying you for." Flynn said that all of his clients, some twenty  
12 people, were depending on Armstrong to sign; that most had  
13 already signed and if Armstrong didn't sign everyone would be  
14 subjected to more "fair game;" that Scientology had ruined  
15 Flynn's marriage and life and he had to get out of the  
16 litigation; that Scientology would continue to make Armstrong's  
17 life miserable. Flynn said that Scientology had promised to  
18 cease all "fair game" attacks on Armstrong and everyone else, and  
19 that the purpose of the settlement contracts was to give  
20 Scientology the opportunity they said they needed to "turn over a  
21 new leaf." In order to relieve everyone involved from the threat  
22 of "fair game," to give Scientology the opportunity they said  
23 they needed to reform, and because of his faith in God, and the  
24 confirmation by Flynn that the "contract" was unenforceable,  
25 Armstrong did go through the spectacle of a videotaped signing.

26 Following the settlement, and before Armstrong responded in  
27 any way, Scientology continued to subject him to "fair game,"  
28 including filing affidavits accusing him of crimes and of being  
an agent provocateur of the United States government; publishing



1 distorted versions of his Scientology history; using documents  
2 which Scientology had requested be sealed in the Armstrong case  
3 to attack him; distributing copies of edited versions of the  
4 illegal videotapes of Armstrong to the media internationally; and  
5 threatening him six times with being sued if he responded to any  
6 attacks. Scientology also continued to subject other people to  
7 "fair game," in violation of its promise through Flynn that it  
8 was ceasing all "fair game" activities.

9 Armstrong attempted to live by the spirit of settlement, and  
10 although deeply saddened and threatened by Scientology's  
11 continuing attacks had not responded, but had tried to live his  
12 life away from the Scientology "fair game" war. Armstrong wrote,  
13 drew, had remarkable ideas, and formed The Gerald Armstrong  
14 Corporation with wonderful hopes and great expectations. In late  
15 1989, however, after a series of threats from Scientology lawyer  
16 Lawrence Heller following Armstrong's being served with a  
17 deposition subpoena in a case against the organization, Armstrong  
18 concluded that he had to do something to defend himself, and to  
19 correct what he saw as an obstruction of justice, which the  
20 settlement contracts and Scientology's enforcement thereof were  
21 working in the legal arena. Heller threatened Armstrong that if  
22 Armstrong testified about his knowledge of Hubbard and  
23 Scientology, even though Armstrong had been subpoenaed to testify,  
24 ~~that~~ Scientology would consider such testimony a breach of the  
25 "contract" and would sue him. Armstrong researched his rights  
26 and responsibilities and concluded that he had a duty to oppose  
27 known obstruction of justice. Armstrong petitioned the  
28 California Court of Appeal to be able to file a response in the  
appeal Scientology had been able to maintain from the



1 Breckenridge decision. Armstrong's filings in the Court of  
2 Appeal in 1990 contain his declaration detailing Scientology's  
3 post-settlement torts and violations. The Court of Appeal  
4 granted Armstrong's petition, he filed a respondent's brief, and  
5 the Court affirmed Breckenridge. Following the California  
6 Supreme Court's denial of review, Scientology filed a motion in  
7 the Court of Appeal to seal the record on appeal. Armstrong  
8 opposed the motion, and the Court of Appeal denied it. The  
9 complete trial transcript, which contains ten days of Armstrong's  
10 testimony about his Scientology experiences up to 1984, is a  
11 public document.

12 In August, 1990 Armstrong was greatly moved by the buildup  
13 in the Middle East toward war, and the general condition of man.  
14 Armstrong prayed to God for guidance as to what he should do, and  
15 received the word of God to give away his worldly wealth.  
16 Armstrong gave his possessions to those whom he believed had a  
17 need for them as put in his heart by God, forgave debts owed to  
18 him, and determined to go where God would have him go and do what  
19 God would have him do; which he believed was to help where his  
20 help was asked for. For the next year God had Armstrong, inter  
21 alia, offer himself to resolve the Middle East conflict, do some  
22 house painting and carpentry work, deal with the pending appeal,  
23 attempt to correct Scientology's subversion of the legal system;  
24 ~~and~~ agree to help the victims of Scientology who asked for his  
25 help; <sup>and</sup> offer himself to resolve the Scientology conflict in which  
26 he had been drawn by Scientology's attacks.

27 Scientology's "fair game" attacks on Armstrong following his  
28 responding in Scientology's appeal of the Breckenridge decision  
include, but are not limited to, secretly videotaping him; suing



1 him four times; attempting to have him jailed for contempt of  
2 court based on Scientology's mischaracterization of his actions  
3 and manufactured charges; filing declarations in various courts  
4 containing false charges, and using the settlement agreement to  
5 prevent him from responding or punish him for responding; using a  
6 paid agent to spread the false rumor that Armstrong has AIDS;  
7 disseminating to the media packs of black propaganda which  
8 provide Scientology's false version of Armstrong's experiences,  
9 including lies that he testified falsely at trial in 1984, that  
10 he has adopted a degraded lifestyle, that he is connected to a  
11 referral agency for kidnapping, that his defense in the 1984  
12 trial was a sham and a fraud, that the Los Angeles Police  
13 Department authorized videotaping Armstrong, that he wanted to  
14 plant fabricated documents in Scientology files and tell the IRS  
15 to conduct a raid, that he wanted to plunder Scientology for his  
16 own financial gain, that he never intended to stick to the terms  
17 of the settlement agreement, that Armstrong's motives are money  
18 and power, that he was incompetent as a researcher, that he  
19 perjured himself about surrendering documents to the court, that  
20 he wanted to orchestrate a coup in which members of the US  
21 government would wrest control of Scientology; publishing black  
22 propaganda about Armstrong without stating its source which  
23 provide Scientology's false version of Armstrong's experiences  
24 including the lies that Armstrong was formerly a heavy drug  
25 pusher, that a Marin Independent Journal photo showed him in the  
26 nude, that he is psychotic and lives in a delusory world;  
27 charging falsely in a letter to the press that Armstrong had  
28 distinguished himself by posing naked in a newspaper; attempting  
to cause Armstrong trouble with the IRS by writing black



1 propaganda letters about him; distributing packs of black  
2 propaganda which attack his lawyer, Ford Greene, and Judge  
3 Breckenridge.

4 Armstrong has worked with attorney Greene since August,  
5 1991. Throughout that period Scientology has attempted by overt  
6 means through misuse of the courts and by covert means to prevent  
7 him from working with Greene and from defending himself.

8 Scientology employed a covert operative, whom Scientology had  
9 infiltrated into Greene's office, to develop a black propaganda  
10 attack that Armstrong and Greene were involved in a homosexual  
11 relationship.

12 Throughout its legal attacks on Armstrong Scientology has  
13 proclaimed that with the settlement contract it sought peace.  
14 Scientology also interprets the settlement contract to mean that  
15 it can say whatever it wants about Armstrong, no matter how  
16 false, obnoxious or evil and that he may not respond.  
17 Scientology claims that if he does respond in any way he is  
18 liable for \$50,000 in liquidated damages. Scientology, after  
19 much forum shopping, and much "fair game," was able to deceive  
20 one judge, who did not understand, into accepting its  
21 interpretation of the settlement contract and ruling against  
22 Armstrong. Scientology interpreted this judge's ruling to mean  
23 that Armstrong owed Scientology \$100,000. Scientology at the  
24 same time intimidated Armstrong's attorney, Ford Greene, into  
25 getting out of the Armstrong case. Scientology had subjected  
26 Greene to years of "fair game" which included infiltrating a  
27 covert agent into his office to steal his records and cause  
28 trouble; hatching a plot with the covert agent to have Greene  
killed; having the agent execute false declarations about Greene;



1 filing five spurious bar complaints against Greene; operating at  
2 least two of Greene's clients as their own agents and paying them  
3 to execute false declarations against Greene and breach their  
4 contract with him. The claim by Scientology for \$100,000,  
5 Armstrong's being without an attorney, without money, and without  
6 the resources and skills necessary to defend himself, brought  
7 Armstrong to file for bankruptcy. Scientology has seized the  
8 opportunity to file the instant complaint.

9       Throughout Scientology's legal attacks on Armstrong it has  
10 intimidated Flynn into not coming forward to assist Armstrong.  
11 Flynn is not only Armstrong's attorney, he is his good friend.  
12 Flynn says that the contract is evil and that Scientology is  
13 evil; and he wants to help Armstrong. Flynn says that he signed  
14 a contract with Scientology to not assist Armstrong, and, while  
15 acknowledging that his contract with Scientology is illegal, he  
16 says that he knows that his life will be ruined even more than it  
17 has been by Scientology if he comes forward to help.

18       Armstrong maintains that Scientology's interpretation of  
19 the settlement contract is unconscionable and unamerican, and  
20 should be opposed with all strength. Because there are dozens of  
21 these "contracts" among first hand witnesses to Scientology's  
22 criminal and tortious practices, and because of Scientology's  
23 "fair game" use of the contract against Armstrong, a terrible  
24 injustice is being abetted by our courts, which should be opposed  
25 with all strength. Armstrong also maintains that for one party  
26 to a "settlement agreement," which is supposed to be essentially  
27 a peace accord, to be able to continue to shoot at the other  
28 party, who is wounded, has been disarmed and is not being allowed  
to defend himself in any way, is not peace at all but a satanic



1 hunting trip. The "settlement agreement" is a permit for hunting  
2 humans.

3 Armstrong was paid in settlement by Scientology for their  
4 years of psychological cruelty, threat and stalking. Scientology  
5 did not learn its lesson but continued its cruelty, threat and  
6 stalking of Armstrong, a person already psychologically hurt and  
7 altered beyond belief by the cruelty, threat and stalking  
8 Scientology promised to cease. Armstrong performed his part of  
9 the 1986 settlement; he dismissed his cross-complaint, released  
10 to Scientology all evidence from his case, removed himself from  
11 controversy, and gave Scientology the time and freedom it said it  
12 wanted to cease fair game.<sup>u</sup> Scientology, knowing that they had  
13 compromised and removed Armstrong's attorney, failed to perform  
14 their part of the settlement, but continued "fair game" against  
15 Armstrong, whom they had psychologically wounded and, they  
16 thought, rendered defenseless. Scientology, in their paranoia  
17 and schizophrenia, which are the inevitable product of the  
18 decision for and prolonged use of neo-satanic "power," failed to  
19 consider God, from Whom all healing of minds, defense and victory  
20 come.

21 In 1991 Armstrong became a Christian. Armstrong had, since  
22 leaving Scientology, come to believe he was guided by God, and he  
23 sought to be guided in all circumstances in which he found  
24 himself. Once its adherents become sufficiently brainwashed  
25 Scientology does not permit them to believe in God, labels and  
26 treats anyone who believes in God as "psychotic," and enforces  
27 the satanic idea that God is an "implant," a false idea installed  
28 by pain and electronics in man's mind to enslave him.

Scientology also teaches that Jesus Christ, the whole Gospel



1 story, and Heaven are implants designed to enslave man, and that  
2 only Scientology has the way to free mankind from the enslavement  
3 of Christianity or other religious beliefs.

4       Scientology promotes to Christians and non-Christians that  
5 it is compatible with Christianity, that it holds the Judeo-  
6 Christian Bible as a holy work, and that it has no argument with  
7 the belief that Jesus Christ was the Savior of Mankind and Son of  
8 God. Scientology has distributed promotional materials  
9 containing these representations to every member of Congress, to  
10 libraries, to the media, to educators, to judges, and to people  
11 of influence across this country. Scientology withholds from the  
12 public its actual enforced beliefs about God, Christ, Heaven and  
13 the Bible. Armstrong believes this is religious fraud, and  
14 dangerous to everyone lured into Scientology, those already held  
15 by its brainwashing system, and society itself. Armstrong also  
16 believes that Scientology's "creed" is a religious fraud because  
17 Scientology, under Hubbard's and Miscavige's control, has never  
18 acted in accord with it. Scientology systematically abuses its  
19 members civil rights, and seeks to remove by whatever means the  
20 same civil rights of its non-Scientologist enemies."

21       Scientology promotes actively and aggressively and uses the  
22 public postal system, public forums and public media for its  
23 promotions. Scientology uses big name celebrities in its  
24 promotions, such as John Travolta, Kirstie Alley, Ann Archer and  
25 Tom Cruise. Scientology does not permit any of its celebrities  
26 to make public their knowledge of Scientology's anti-Christian,  
27 anti-religious inner nature, its fraudulent promises and public  
28 lies, abuse of human beings, and dangers to families and  
children. Surveys done in the past two years by FACTNet, a cult



1 victims advocacy organization has revealed that while vastly  
2 overstating its actual membership Scientology has had an  
3 inordinate number of suicides, unexplained deaths and psychotic  
4 episodes by people undergoing auditing. If any celebrity  
5 acknowledged these evils he or she would become "fair game."

6 Armstrong sees that Scientology uses its tax-exempt wealth  
7 to violate his and other civil rights. Armstrong believes that  
8 this is not a legal purpose and not a purpose for which tax-empt  
9 funds can legally be used. Armstrong sees that Scientology  
10 tricks and extorts huge sums of money from people it gets in its  
11 system for something of no value. This money will be used to pay  
12 lawyers to attack the same people and those who sought to bring  
13 to light or curtail the abuse. Armstrong believes that  
14 Scientology obtained its tax-exempt status in 1993 by illegal  
15 means. Armstrong believes that the Internal Revenue Service and  
16 the United States government agencies responsible were derelict  
17 in their duties in granting such tax exempt status. Armstrong  
18 believes that Scientology's leadership is involved in white  
19 collar crime, including securities scams and extortion.

20 Scientology will not acknowledge that God works in people's  
21 lives. To do so would be a violation of policy, punishable in  
22 "ethics," and being labeled and treated as "psychotic." The  
23 attorney executing Scientology's complaint, Laurie Bartilson, is  
24 a Scientologist. She has executed several documents in the State  
25 case which contain false statements about me. She attempted  
26 through false statements to have me jailed for contempt of court.  
27 She is completely under the power of David Miscavige. The  
28 complaint is colored by her required hatred of Armstrong, and the  
need of satan to create illusion.



1 God in this litigation is pointing out gently that He is in  
2 charge, and that satan is a bad belief in which faith should not  
3 be put because faith in satan is always betrayed. The undeniable  
4 fact is that God led Armstrong through his whole life to here;  
5 and there is no evidence whatsoever with plaintiff or anyone else  
6 that He will not lead him from here on. Miscavige and  
7 Scientology seek through power to bring into belief the illusion  
8 that Armstrong is obsessed with Scientology in order to excuse  
9 their obsession with him. They are faced with an overwhelming  
10 mountain of uncontroverted evidence that Armstrong gave away his  
11 worldly assets because he was so guided by God, and for no reason  
12 connected with Miscavige, Scientology or Hubbard. Without a jot  
13 of evidence they seek to con the world into believing that  
14 Armstrong renounced his possessions to facilitate his intended  
15 breaches of their hunting permit. God has used Armstrong for His  
16 purposes through a time when Miscavige, Scientology and Hubbard  
17 declared Armstrong "fair game," and attacked him out of their  
18 paranoid and schizophrenia, ~~which they excuse~~ <sup>excused by the doctrine</sup>. They have done  
19 everything they could that they thought could be argued as being  
20 within the law to attack and hurt him, and to hurt others, some  
21 of whom have been sent to him because they were hurt.  
22 Armstrong's actions in helping anyone are religiously motivated  
23 and completely protected by this country's and state's  
24 constitutions. Armstrong's experiences in or out of Scientology  
25 are sacred and the expression thereof cannot be suppressed in  
26 violation of the <sup>se</sup> constitutions.

## GENERAL DENIAL

28 Armstrong generally denies the allegations in Scientology's  
complaint.



1                    FIRST AFFIRMATIVE DEFENSE

2                    (Failure To State A Cause Of Action)

3                    SECOND AFFIRMATIVE DEFENSE

4                    (This Court Cannot Enjoin The Practice Of A Profession)

5                    THIRD AFFIRMATIVE DEFENSE

6                    (Unclean Hands)

7                    FOURTH AFFIRMATIVE DEFENSE

8                    (In Pari Delicto)

9                    FIFTH AFFIRMATIVE DEFENSE

10                   (Illegality)

11                   SIXTH AFFIRMATIVE DEFENSE

12                   (Fraud and Deceit)

13                   SEVENTH AFFIRMATIVE DEFENSE

14                   (Estoppel)

15                   EIGHTH AFFIRMATIVE DEFENSE

16                   (Waiver)

17                   NINTH AFFIRMATIVE DEFENSE

18                   (Mistake Of Law)

19                   TENTH AFFIRMATIVE DEFENSE

20                   (Mistake Of Fact)

21                   ELEVENTH AFFIRMATIVE DEFENSE

22                   (Conflict of Interest)

23                   TWELFTH AFFIRMATIVE DEFENSE

24                   (Duress and Undue Influence)

25                   THIRTEENTH AFFIRMATIVE DEFENSE

26                   (Laches)

27                   FOURTEENTH AFFIRMATIVE DEFENSE

28                   (Impossibility)

FIFTEENTH AFFIRMATIVE DEFENSE



(Frustration of Contractual Purpose)

SIXTEENTH AFFIRMATIVE DEFENSE

(Unfair and Unreasonable Contract)

SEVENTEENTH AFFIRMATIVE DEFENSE

(Lack of Mutuality)

EIGHTEENTH AFFIRMATIVE DEFENSE

(Ambiguity)

NINETEENTH AFFIRMATIVE DEFENSE

(Lack of Adequate Consideration)

TWENTIETH AFFIRMATIVE DEFENSE

(Unconscionability)

TWENTY-FIRST AFFIRMATIVE DEFENSE

(Adhesion)

TWENTY-SECOND AFFIRMATIVE DEFENSE

(Hardship)

TWENTY-THIRD AFFIRMATIVE DEFENSE

(Offset)

TWENTY-FOURTH AFFIRMATIVE DEFENSE

(Liquidated Damages Act As Penalty)

TWENTY-FIFTH AFFIRMATIVE DEFENSE

(First Amendment - Religion)

TWENTY-SIXTH AFFIRMATIVE DEFENSE

(First Amendment - Speech)

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

(First Amendment - Press)

TWENTY-EIGHTH AFFIRMATIVE DEFENSE

(First Amendment - Association)

TWENTY-NINTH AFFIRMATIVE DEFENSE

(Privacy)



1                    THIRTIETH AFFIRMATIVE DEFENSE  
2                    (Implied Covenant of Good Faith and Fair Dealing)  
3                    THIRTY-FIRST AFFIRMATIVE DEFENSE  
4                    (Justification - Defense of Another, Interests  
5                    of Third Persons, and the Public)  
6                    THIRTY-SECOND AFFIRMATIVE DEFENSE  
7                    (Res Judicata)  
8                    THIRTY-THIRD AFFIRMATIVE DEFENSE  
9                    (Collateral Estoppel)  
10                   THIRTY-FOURTH AFFIRMATIVE DEFENSE  
11                   (Failure to Mitigate Damages)  
12                   THIRTY-FIFTH AFFIRMATIVE DEFENSE  
13                   (Action Barred By Equity and Civil Code Provisions)  
14                   THIRTY-SIXTH AFFIRMATIVE DEFENSE  
15                   (Void As Against Public Policy)  
16                   THIRTY-SEVENTH AFFIRMATIVE DEFENSE  
17                   (The Settlement Agreement Cannot Be Specifically Enforced)  
18                   THIRTY-EIGHTH AFFIRMATIVE DEFENSE  
19                   (The Settlement Agreement Cannot Be Specifically Performed)  
20                   THIRTY-NINTH AFFIRMATIVE DEFENSE  
21                   (Due Process)  
22                   FORTIETH AFFIRMATIVE DEFENSE  
23                   (Equal Protection)  
24                   FORTY-FIRST AFFIRMATIVE DEFENSE  
25                   (Right to Counsel)  
26                   FORTY-SECOND AFFIRMATIVE DEFENSE  
27                   (Public Domain)  
28                   FORTY-THIRD AFFIRMATIVE DEFENSE  
                     (Privilege)



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WHEREFORE, Defendant Armstrong prays for relief as follows:

1. That CSI takes nothing by its complaint;
2. That Armstrong recover his costs of suit herein;
3. That Armstrong recover his attorney's fees and costs of defending the suit herein;
4. That the Court award such further relief as it may deem proper.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'G. Armstrong', is written over a large, dark, oval-shaped stamp or seal.

DATED: August 14, 1995

GERALD ARMSTRONG



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PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: GERALD ARMSTRONG'S ANSWER on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Andrew Wilson, Esquire	LAURIE J. BARTILSON, ESQ.
WILSON, RYAN & CAMPILONGO	Moxon & Bartilson
115 Sansome Street, 4th Floor	6255 Sunset Boulevard
San Francisco, California 94104	Suite 2000
	Los Angeles, California 90028

[x] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[x] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: August 14, 1995

